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Accountability Program (VSA) For Public
Universities and Colleges

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***Toward a Voluntary System of Accountability
Program (VSA) For Public Universities and
Colleges***

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Our earlier papers, *IMPROVING STUDENT LEARNING IN HIGHER EDUCATION THROUGH BETTER ACCOUNTABILITY AND ASSESSMENTS* and *ELEMENTS OF ACCOUNTABILITY FOR PUBLIC UNIVERSITIES AND COLLEGES*, explored the nuances of public university accountability. They have enjoyed wide exposure and stimulated conversation, particularly among NASULGC and AASCU Presidents, Chancellors and Provosts. This paper comes out of these conversations and further develops the elements that appear to be important in creating the Voluntary System of Accountability Program (VSA).

INTRODUCTION

Higher education historically has played a vital role in this country, enabling social and economic mobility for individuals and creating cultural, scientific and technological progress for society as a whole. NASULGC and AASCU have embarked on an effort to enhance university accountability and our members broadly recognize the gravity of this mission. “We have the keys to the future and the obligation that comes with holding them,” said a provost at a meeting discussing accountability. In an era in which Thomas Friedman’s book, *The World is Flat*, has served to raise awareness and to catalyze concern about the competitiveness of the American economy and, consequently, the future welfare of every American, holding those keys confers an even greater obligation. Our universities, particularly public universities, are obligated to carefully focus their resources upon their individual segments of their missions and to effectively and efficiently utilize them.

It is against this background that the university community understandably has been called upon to be even more accountable. Every public university is engaged now in serious and ongoing accountability appraisal with significant time and resources dedicated to the task. The academy’s commitment to accountability is real. Nevertheless, we are prepared to supply more and better accountability information to our diverse stakeholders.

Accordingly, we suggest what we believe will be a reasonable and helpful set of undergraduate education accountability measures for universities that we label the “Public Universities and Colleges Voluntary System of Accountability for Undergraduate Education” (VSA). The set contains key measures that provide basic data to help students (and parents) find the university that best fits their needs, gauges the degree to which students on various campuses engage with the learning process and helps stakeholders assess the increase in undergraduate student learning that is occurring at universities. Transparency in collecting and presenting this information is important if we hope to have a voluntary accountability system acceptable to the public.

Focusing on accountability for undergraduate education, one of several important functions of public universities satisfies a need, but it should not be construed as accounting for the totality of university output. The Council on Competitiveness recognizes the importance of undergraduate education, especially in the science, technology, engineering and mathematics (STEM) areas, as crucial to the nation’s future. However the Council also recognizes that university graduate education and research are similarly critical. Likewise, the Kellogg Commission on the Future of State Colleges and Land-Grant Universities described the engagement universities provide as vital to domestic communities and the world. These important products of universities are

evaluated extensively and we share those evaluations freely. Universities should and will continue such reporting.

We suggest a voluntary accountability system in which universities may elect to participate. This paper represents the beginning of an effort and there clearly must be a community process developed to monitor and make appropriate modifications as time goes on. If the academy can agree on this meaningful but manageable set of accountability measures, we would generally satisfy the public by providing more useful information. There would be economy and value in that result. Moreover the academy would retain the ability to choose measures that we can use to improve our ability to educate our undergraduate students.

We urge that this accountability data be used only to compare specific universities with their own past performance and with the performance of comparable universities. We think that regional accreditors will want to consider using the set of accountability measures to help satisfy their standards and governing boards may also want to substitute these measures for the information they currently require of institutions.

We begin with the set of first principles that presidents and provosts felt to be important tests of the viability of a voluntary system of national public university accountability.

FIRST PRINCIPLES ABOUT ACCOUNTABILITY MEASUREMENT DERIVED FROM THE DISCUSSIONS

- 1- As educational institutions, our first obligation is to develop and use those accountability measures that provide the maximum assistance in improving the educational outcomes of our students.
- 2- The interests of higher education are best served if our accountability measures focus on the increase in educational value for which we are responsible and not on the initial intellectual and educational endowments our students possess at matriculation.
- 3- All of our accountability measures should be transparent. Both the methods by which they are derived and the results of those measures should be publicly disclosed.
- 4- The immense diversity of American higher education institutions is a valuable attribute. For that reason universities should be compared against their own past performance and with other universities with similar missions, academic programs and admissions practices.
- 5- Even comparisons of similar universities should be limited to individual accountability measures, not indices composed of multiple accountability measures.
- 6- Because our resources are used best when directed toward our educational, research and service missions, only those resources absolutely required should be allocated to this enhanced accountability effort. Consistent with this aim:
 - The rigorous set of accountability measures proposed here should be evaluated by accreditors and governing boards and, where possible in order to help contain cost, substituted for the accountability measures currently mandated or generally used to provide evidence that standards have been met.
 - Where appropriate, sampling should be employed in measuring outcomes and campus learning climate rather than measuring every student at significant costs.
- 7- The national interest requires developing measures to assess broad international trends related to student learning; access and student progress in higher education; public investment in research, education, student support and other valued purposes in higher education; and public return and national economic competitiveness on investments in higher education.

CONCLUSIONS ABOUT CONSTITUENCY ACCOUNTABILITY

There has been widespread agreement among presidents and provosts who have read versions of this paper that we should be and/or are expected to be accountable to three constituencies:

- 1- Prospective students, current students and their parents;
- 2- Faculty and campus support staff;
- 3- Public policy-makers and public and private funders of higher education.

1-Prospective students, current students and their parents

The impact of undergraduate education lasts a lifetime as it lays the foundation for graduate study and one's future occupation. In choosing a university for undergraduate study, students and their parents have made a decision that will have fundamental effects. We owe them information that would be helpful in making this choice. When one reflects on the questions students and parents ask, what is meant by "Student and Parent" information becomes reasonably clear.

- *How much will it cost to go to your school?*
- *Are there costs beyond the required base tuition? What are they?*
- *What kind of jobs do your graduates get?*
- *How much does it cost to live in the residence hall?*
- *May I live off campus during my freshman year?*
- *Will the college-level coursework that I have taken in high school or at a community college transfer? Will all of it transfer or just some of it?*
- *How long will it really take me to earn a degree?*
- *What is your graduation rate?*
- *How many students fail to receive a degree?*
- *How likely are students like me to graduate from your university?*
- *What chance of getting a degree do transfer students have?*
- *Are student jobs available on campus?*

These questions and many others are regularly directed to admissions personnel, presidents, provosts, other faculty, and even current students.

In a world in which financial aid programs struggle to keep up with demand, and the burden of paying for undergraduate education increasingly falls on students and/or their parents, we should provide as clear and concise answers to their questions as we can. These answers should allow them to compare institutions by the measures most relevant to them. The ultimate result of providing such information should be to improve the fit between student and university, resulting in greater satisfaction and improved educational success. Improving the initial fit for students should reduce transfers among four-year colleges and ultimately reduce the cost of education to the student.

2- Faculty and campus support staff

Information on student learning at one's own university and at comparable universities provides helpful data to faculty and staff. Derek Bok in his recent book, Our Underachieving Universities, urges all universities to measure educational outcomes so that we can know which educational practices are effective. Core educational outcomes measurement will provide data to help faculty choose among teaching strategies based on their relative success. Accessing key measures of educational effectiveness at other institutions will be valuable in determining if curricular innovations, methodologies and expectation levels present in those universities better achieve desired results than do those in one's own university. Clearly, providing this kind of evaluative and comparative information to faculty and staff is essential to improving the university.

Because improving student learning is our primary goal, universities must be accountable to those who teach and interact most with our students. Faculty and staff need feedback about student engagement and their success in educating students. The kinds of data from the National Survey of Student Engagement (NSSE) or the Cooperative Institutional Research Program (CIRP), which we label "Student Engagement with Campus Data," help faculty and staff to know whether their students are being expected to read, write and participate in class discussions as much as at comparable universities. The data tell them whether their university's students are reasonably engaged with their institution. This information helps benchmark campus and faculty practices against those in comparable universities. In this more controlled environment, change can be introduced and the impact of that change on student engagement with the campus and learning can be thoroughly evaluated

3-Public policy-makers, members of the public and public and private funders of higher education

Public policy-makers, members of the public and public and private funders can choose to bestow their attention and funding on higher education or myriad entities that compete for funding with universities. Clearly included in this grouping are legislators and members of boards of trustees but also foundation board members and, equally importantly, alumni. Each wants to know the conditions under which the public is provided access to higher education, who is receiving the benefits and how much learning is occurring. We believe that the data elements in VSA will be of value to the diverse members of this group.

COMPONENTS OF ACCOUNTABILITY AND THEIR ATTRIBUTES

What is suggested by VSA is essentially a bundle of data focused on undergraduate education whose individual elements deal with important and legitimate concerns. The hope is that those that use the elements will be able to gain a fair and useful view of important facets of each participating university. Each of the groups

described above should benefit from improved systems of accountability. We suggest that a packet of information could provide that accountability if it included: 1) student and parent information, 2) student campus engagement data of the sort that can be derived from NSSE or CIRP and 3) value-added core educational outcomes information that could be derived from national instruments such as the Collegiate Learning Assessment (CLA), Measure of Academic Proficiency (MAP), Collegiate Assessment of Academic Proficiency (CAAP) or Graduate Record Examination (GRE).

Comparable Data. For the data set to serve the needs of students in their search for the right university and to satisfy public accountability demands, that packet must contain comparable data across universities. This data set by design must incorporate measurement of items common to all universities offering baccalaureate degrees. (Universities, of course, will continue to have more thorough data sets available for other management and evaluation purposes.) The student and parent information component of VSA will answer questions and supply data about elements of interest to those selecting a university in a straightforward manner because the conventions used to define and report the data will be common across all participating universities. The student campus engagement data has been defined by the two existing instruments that collect it and can therefore be uniform across campuses that choose to use either of them. Finally, despite the significant and admirable diversity of our universities, the resulting core outcomes data included will be restricted to a small set of tests that reflect, among other educational outcomes, the commonly expected core educational outcomes of undergraduate education: development of critical thinking, analytical reasoning and written communication skills.

Disclosure. Both the student and parent information and the core educational outcomes data must be made available publicly if they are to satisfy student and public accountability needs. Since the use of core educational outcomes tests is new to most universities, they will understandably want to have a period in which they find the best methods of administration and use the results to adjust their educational programs before making the results of the outcomes tests public. We recommend that this period of experimentation be three or four years. Similarly, most universities now view the results of NSSE/CIRP as diagnostic in nature and choose to use them to help guide the internal agenda for change rather than have them as a public indicator of their performance. But the public and prospective students have an interest in the summary reports of engagement data and in most states have a right to see it under the various state freedom of information acts. For those reasons we recommend that summary engagement data be part of the VSA data set while recognizing that many universities, especially those that have previously not had the benefit of information from such instruments, will want to have an opportunity to adjust their practices and operations once they administer the instruments. In addition, universities commonly choose to administer these instruments only every three years. Accordingly, we recommend that data like this not be made available as part of the VSA during the first four years of the operation of the accountability system. Thus, after four years the entire VSA data should be publicly available from each participating university.

VSA will not serve all needs. Our intention is that it serve the set of needs common to those seeking, delivering, overseeing, developing policies for or funding undergraduate degrees at U.S. universities. We fully recognize that there is more specialized data that individual schools must collect for their own use. Indeed, for purposes of measuring the effectiveness of individual majors, universities will need to continue a regular set of program reviews.

Only appropriate comparisons should be made. Universities participating in VSA will use the same format and terminology for the set of core accountability measures and the public reporting of them. As a result comparison of universities on specific dimensions of interest to potential students will become easier. We must caution that there is no intelligent way to generally compare institutions that are essentially different in focus.

Only comparison among *comparable universities* is appropriate. The best comparison is of one university with itself over time. In order to enable comparison other than self-comparison, it is necessary to group universities appropriately. Frankly, we at NASULGC and AASCU cannot and should not establish groups for the sake of comparison. Individual universities generally have defined peer groups. We encourage universities to publicize the names of universities within those groups so that the comparisons can be made with defined peers. A limited form of comparability exists among institutions with similar admissions criteria so we recommend that the data set include figures on both entering average SAT and ACT scores and entering average GPAs. We must realize, however, that even similar admissions standards universities may differ markedly on funding, curricular approaches, resident or commuting populations, etc., and may not be fundamentally comparable at all.

We note that the Education Trust website, College Results Online, utilizes an algorithm to develop university peer groups and also permits the user to specify alternate peer groups. None of the above is meant as a criticism of their approach or of those who use other algorithms for this purpose. The user of any peer group should always ask whether any grouping specified is really made up of “peers” for the purposes for which they wish to use the grouping.

We vigorously oppose creating any overall ranking scheme based on the bundle of accountability measures we recommend here. Of course, we understand that public data is just that and will be used by others. We advocate that common accountability data be presented by institutions with the user of the data encouraged to place whatever weight on the *individual data elements* she/he prefers. Given that missions, student selectivity, urban/rural location, student body composition, etc., differ by university, combining the accountability data into any form of index for the purpose of ranking these universities would represent a disservice to them. Such indices may also constitute a disservice to our three core constituencies as the individual data elements are tailored to answer specific questions for specific groups. Combining data into any sort of index will serve to obfuscate what the carefully defined, distinct data elements are intended to clarify.

A Brief Focus on the Set of Measures

Selection of Specific Accountability Measures and System Implementation

Through the distribution of this paper and subsequent conversations and campus visits with presidents and provosts we are seeking feedback to further refine the concepts in the VSA. When the core concepts of VSA are widely accepted in the public university community, we envision developing a process by which the universities inclined to participate in VSA would work through the national associations representing them (or through some other acceptable organization) to decide upon the specific elements of student and parent information, the specific set of student engagement with campus measures and the specific set of core educational outcomes measures to be utilized. Once that bundle of measures constituting the VSA is agreed upon, individual universities would then voluntarily choose whether to become a VSA university.

VSA universities would maintain their VSA information on their own publicly accessible web sites. Since the data would be in a common format and the definitions would be uniform, those wanting to access any university's information could do so through the web. There would be no need for any agent of the academy to hold the data for all universities in a common repository. Third parties might choose to harvest the data and build repositories from it as they do with other organizational data such as USDE's IPEDS that is publicly maintained.

Because all of these processes would take some time to develop and implement, and because universities need time to adjust practices to the findings from the initial measurements, we do not envision the first complete reports from individual universities subscribing to the national standards of accountability to be available to the public until at least four years after agreement is reached to proceed with this notion. Thus complete public reports would not be available until fall, 2011, but reports on the student and parent information would be available earlier.

Three Components of Public University Accountability

As described above there was interest/agreement that three specific components should be included in VSA:

1. Student and Parent Information
2. Student Campus Engagement
3. Core Educational Outcomes

1. Student and Parent Information. This accountability category primarily focuses on students and their parents. Accordingly, this data should be chosen after first asking the question: *“What information would be most helpful to prospective students and their parents in deciding which university best fits their educational wants and needs?”* Clearly various actual price of attendance figures, degree offerings, living arrangements, graduate placement statistics, graduation rates, transfer rates, employment facts (concerns about the suitability of available data sources to provide these facts have been detailed in the appendix to the earlier papers), etc., would be included here. To facilitate appropriate comparison, the data sets will include the list of universities considered by each participating university to be its peers in undergraduate education and also will include entering test scores such as average ACT/SAT and entering GPA. We do not envision the data set incorporating all the data elements universities now must report to the federal government. In order to maximize the usefulness of the accountability system data, the system may include some of that data.

Any valid accountability data set must include student success measures such as graduation rates. Unfortunately, a true picture of graduation rates cannot be generated from data currently available, as information on where students transfer within the higher education system cannot be reliably ascertained from existing data sets. The academy is short-changed by not having robust data available to develop the complete picture. Therefore we support serious conversations among higher education, congressional and U.S. Department of Education leaders leading to the development of a data set that will overcome the current limitations on measuring graduation and transfer rates. Any resulting data set must protect the privacy of individual students and be utilized only for legitimate higher education accountability purposes.

2. Student Engagement with the Campus. Both the NSSE and the CIRP are proven programs that enable campuses to compare student self-reports about learning-related behaviors. This data has proven valuable to faculty and staff by enabling them to make alterations in both campus and classroom environments to provide greater stimulation to students. One of these two measures should be part of the accountability package. The output of each of these surveys is complex and lengthy. While it may be of limited interest to some outside the university, its primary value is to faculty and staff as they seek to understand the learning environment and improve it. Public reporting through

VSA should include only summary student engagement data, not the very detailed components from which the summary elements are developed. The value of NSSE and CIRP instruments is described in some detail in our *IMPROVING STUDENT LEARNING* paper.

3. Core Educational Outcomes. Each of the groups to whom we need to be accountable has asked for data, sometimes often, on the development of critical thinking, analytical reasoning, and written communication skills. Core educational outcomes like these are a primary component of undergraduate education and should be measured for the accountability purposes under discussion here. Tests like the CLA, MAP and CAAP measure them to varying degrees, even though the latter two tests were designed to measure general education, not core education, outcomes. Even the GRE, although it measures abilities and learning at a much higher level than the other three tests, also reflects accomplishment of the core outcomes. While each university may aspire to develop outcomes in addition to these three sets of skills, these three appear to be common outcomes undergraduate education is expected to produce at most NASULGC/AASCU institutions. Research on the ability of standardized tests to measure these core education outcomes is ongoing and must continue until sufficient numbers of students at institutions of varying sizes and types have taken the exams. Only then can we reach firm conclusions on the adequacy of the various tests to measure these core education outcomes.

What we do know about performance on standardized tests like the CLA, MAP, CAAP and the GRE is that it reflects both the initial ability of the student entering the institution and the educational value added by the institution. For institutional accountability purposes, only a measure of the latter is desired. One can directly adjust the performance of seniors on core educational outcomes exams for entering ability (as measured by ACT or SAT scores when the students were accepted for admission to the university) or one can administer the core educational outcome test twice (freshman/senior years) and use the difference in test scores to judge how much core educational value is added by the institution. Of course many things happen to a student between the freshman and senior years that are unrelated to the education provided by the university, e.g., travel, development of a wider social network, summer and academic year jobs, and each of these may have an effect on standardized test scores. Nonetheless, it is clear that selecting one of the normalization techniques is required to refine the measurement such that it comes closer to approximating only the value added by the university.

We are aware that controversy surrounds value-added measurements. Both freshmen and senior CLA test results are highly correlated with incoming ACT/SAT results. (The same close relationship would probably be found with ACT/SAT scores if CAAP, MAP and GRE were also given to freshmen and seniors.) The 2005-06 CLA round of campus administrations however, found significant, positive value added. Measurement difficulties do not diminish our resolve that value added is the appropriate outcome measure upon which to focus. It does mean that the developing science of

value-added learning measurement must be sensitive to these relationships and that a value-added measure initially chosen by a university may have to be reconsidered as additional research results are amassed.

One therefore must regard value-added measurement as still in the “experimental” stage. Accordingly, we cannot at this time recommend the selection of a *single* test for all universities subscribing to a national public university accountability system. Instead, we recommend that a set of three or at most four outcomes tests be selected by the universities participating in VSA and that each university in the interim select the one test from that set that measures best the core educational outcomes goals that the school has designed its curriculum to produce. After the three or four years, schools would consider the ability of its chosen test to measure core educational outcomes and confer with other universities about the performance of the tests they chose to use. Perhaps at that time a single “best” core outcomes test will emerge and a single test could be adopted across all VSA universities. Perhaps individual universities will find that different specific tests fit them best and no single outcomes test will emerge. If this eventuality arises it is conceivable that research could produce a set of “cross walks” that would permit one to convert the scores and sub-scores on any test into the scores and sub-scores on the other tests. (Note that such a cross walk is in common use to convert ACT/SAT scores with the result that many schools are willing to accept either score for admissions purposes.)

We are aware that having participating universities measure core educational outcomes, at least initially, with one of three or four different tests does not immediately fully satisfy the goal of producing “comparable” value-added outcomes data although it may do so by the end of the experimental period. The newness of one of the tests (the CLA), the likely emergence in the market of other tests and the lack of familiarity of some universities with any of the existing tests, suggests that the route described above is the most prudent and educationally sound.

While value-added measurement is for most purposes the appropriate measure for public universities, the educational outcomes test score itself has importance for some universities. Interpreting the meaning of specific test score performance levels may be problematic. Any value-added approach involves generating raw test scores, so the value-added focus we recommend does not preclude the availability of test score data.

A serious problem that remains for general education assessment testing is the difficulty of ensuring that the students tested are motivated to perform at their best level while taking the tests. This problem is generally not a matter of concern when students are taking classroom exams or the ACT/SAT or GRE exams as the test-takers are motivated by self-interest to do well. General education standardized exam performance, by contrast, has no impact on the test taker but may have consequences for the university. In a sampling scheme like that employed by the CLA, having only a small percentage of the typical sample of 100 students treat the testing experience as a lark or malevolently decide to do harm to their institution, can seriously bias the general education outcome the campus reports. Various methods have been suggested to correct this problem,

ranging from embedding the test into a capstone course with performance on the exam counting as part of the course grade, to awards of iPods to top performers on the exam. To avoid this motivation bias problem some campuses may even decide that they will not use a sampling strategy in measuring general education gains but will instead administer CLA-like measures to every student in a required capstone course. There are many techniques available to avoid such bias and we do not endorse any one technique here. It is clear that every university will need to tailor a method to its peculiar requirement to ensure that motivation problems do not bias test results.

Similarly, where sampling is utilized, uniform sample selection practices must be implemented to ensure that the tests are administered to a truly random sample of students. Every campus naturally wants to show its best face and thus there will be the temptation to administer the test to non-random samples of students, e.g., to high-ability individuals. Unless uniform sample selection procedures are agreed to and rigorously observed on every campus, the willingness of campuses to participate in any general education assessment venture and particularly their willingness to make results public will be undermined.

Unfortunately, there are no standardized tests that measure campus-wide the value added for the entire undergraduate educational experience. Constructing such a test is extraordinarily difficult as campuses have diverse sets of majors and degree programs and the likelihood of getting agreement on common educational outcomes is low. In addition, the sheer number of majors at U.S. universities is in the hundreds so the effort to develop a comprehensive suite of major-specific outcomes tests is mammoth. There are, however, outcome measures that indicate overall campus educational outcomes for a handful of *specific* purposes. They include the LSAT, MCAT, GMAT and the GRE specialized disciplinary exams. We are not now recommending using these measures as part of this educational outcome suite because they measure the experience of only very small and highly self-selective samples of the student population at some universities. We also do not know how these measures relate to core educational outcome measures. Further research could help conclude whether including these measures in the bundle would be justified.

Measurement Frequency

Data on each of the measures need not be collected annually. Many users of NSSE administer it every two or three years as the campus climate seldom changes suddenly and schools wish to allow time for interventions they implement to have an opportunity to work prior to re-administering the test. Similar considerations may lead to the decision to administer other measures on a biennial or triennial schedule. Explicit decisions about the frequency of testing must be made so that the expense of administering the instruments or collecting the data is commensurate with the value of the data obtained.

IMPLEMENTATION OF VSA

Representatives of universities agreeing in principle to establish the VSA would be convened to decide upon the data elements/measurements that would constitute each portion of the data set and the conventions that would be observed in data definition, measurement and presentation.

Universities that agree to subscribe to the system as defined by the above process and who agree to observe its conventions will be known as VSA. The minimum components of public accountability that would be included are:

1. The full set of student and parent information measures agreed upon;
2. Student engagement with campus measures-NSSE or CIRP or other measure selected; and
3. Core learning outcomes measures: Use of one of the three or four outcomes tests (CLA, MAP, CAAP, and GRE) agreed upon for the experimental period.

Thus, every university that chooses to be a member of the Voluntary System of Accountability would utilize and report to the public precisely the same student and parent information measures, one of the three or four agreed upon learning outcomes measures and summary results of a student engagement with campus survey.

The system, once in place must not be static as the educational and technological environment changes rapidly. Thus, a mechanism to review the components of VSA and change them as needed must be put in place.

FINAL THOUGHTS

The Role of Regional Accreditors. Regional accreditation associations serve a quality assurance role of major importance to American higher education and the public. We do not wish to replace this role with a national set of public university accountability standards. We ask that the six regional associations consider declaring that they will accept the resulting set of accountability measures as appropriate evidence for some standards. Doing so enhances the goal of achieving transparency and comparability on a national level. We understand that most regional accreditation standards already permit the university seeking accreditation or reaccreditation to choose a variety of ways to

satisfy their standards and that this request is therefore minimal. In order to further promote adoption of these accountability standards, the regional accreditation associations should be convened at an appropriate time to consider how to achieve this objective.

For the sake of Parsimony. If universities agree on a set of national undergraduate accountability standards they are agreeing to gather and supply a considerable volume of detailed information on a regular basis at significant expense. University budgets are not generous and all would rather expend as many scarce resources as possible directly on the educational mission. If such voluntary measures are put in place we believe the universities using them will have a strong basis for asking state and federal government agencies, governing boards, regional accrediting agencies and others to agree to a moratorium on requests for more accountability measurement and to begin a review of existing requirements with a view to determining whether some might be eliminated. If an accountability system provides a set of consistent, clear and comparable data and satisfies the various stakeholders, some other measures could be withdrawn. It is our hope that the measures chosen would replace most existing measures, not add to them.

The Need for a Continuing Process. Agreeing to create and implement a voluntary national set of accountability standards cannot be the end of this process. Since the core outcomes measure must be subjected to a period during which experimental use of the various available tests occurs, a mechanism to evaluate the status of the candidate tests must be put in place. In addition, what is an adequate accountability process today may not be considered adequate tomorrow due to changes in the educational environment and technology. Thus a mechanism must be created to provide oversight to the agreed upon set of standards and to permit the system to be responsive to changes in the environment and lessons learned.

CONCLUSION

The set of Public Universities and Colleges Voluntary System of Accountability for Undergraduate Education standards described here amounts to self-evaluation by those universities that choose to subscribe to it. This self-evaluation system arises from the same tradition as does our voluntary accreditation system that has served both the public and the academy well. It preserves the diversity of the U.S. higher education system while permitting the public to judge the various facets of individual universities.

While these suggestions are based on feedback from a substantial number of correspondents who read the predecessor papers, *IMPROVING STUDENT LEARNING IN HIGHER EDUCATION THROUGH BETTER ACCOUNTABILITY AND ASSESSMENT* and *ELEMENTS OF ACCOUNTABILITY FOR PUBLIC UNIVERSITIES AND COLLEGES*, we hold no illusion that it cannot be improved. We ask for your comments and suggestions. Please send them to dshulenburg@nasulgc.org or pmcpherson@nasulgc.org.